

# EXHIBIT C

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS )  
LIABILITY LITIGATION )**

\_\_\_\_\_)  
**THIS DOCUMENT RELATES TO:** )  
 )  
**All Suits Against the Saint Thomas Entities** )  
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**MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)**

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**Notice to GDC Properties, LLC of 30(b)(6) Deposition**

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Defendants, Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network (collectively the “Saint Thomas Entities”), pursuant to Federal Rule of Civil Procedure 30(b)(6), come now and give notice that the oral and videotaped deposition of GDC Properties Management, LLC (“GDC”), as an organization, will be taken on the topics detailed below. GDC shall identify the person(s) who will speak on its behalf on each topic at least seven (7) days before the deposition(s).

The deposition will be taken on June 12, 2015, beginning at 9:00 a.m. (EDT) and continuing until completed. The deposition will take place at the offices of NUTTER McCLENNEN & FISH LLP, Seaport West, 155 Seaport Boulevard, Boston, Massachusetts 02210. The deposition will be recorded by stenographical means and by video.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), GDC’s designee(s) shall be prepared to testify regarding the following subjects:

1. The use of the property located at 687-705 Waverly Street, Framingham, Massachusetts, 01702 (hereafter “NECC Facility”), by any tenants since 2005;
2. The business relationship between GDC, NECC, Ameridose and any other affiliated or related company<sup>1</sup>, including all documents reflecting the terms, conditions and scope of such relationship;
3. Identification of all employees, owners, managers or other representatives of GDC;
4. The employees, managers and executives of GDC, including chain of command and decision making authority;
5. The responsibility of GDC and each tenant at the NECC Facility with respect to maintenance and repairs to the premises;
6. Repairs, complaints, work orders, renovations or modifications performed at the NECC Facility;
7. The compounding of sterile drugs by NECC or Ameridose;
8. The cleanrooms operated by NECC and/or Ameridose, including without limitation cleaning and maintenance activities relating to same, whether or not performed by GDC;

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<sup>1</sup> These include:

1. Ameridose
2. Medical Sales Management
3. Medical Sales Management, SW
4. 203 Flanders Road, LLC
5. 205 Flanders Road, LLC
6. Alanus Pharmaceuticals
7. AMD
8. Cadden Family- 2012, LLC
9. Cardo Properties, LLC
10. Conigliaro Block, Inc.
11. Conigliaro Family Investments, LLC
12. Conigliaro Industries, Inc.
13. GDC Holdings, Inc.
14. GDC Properties Management, LLC
15. Hunter Holdings, LLC
16. L&S Creations, Inc.
17. MSM, Inc.
18. MSM SW, Inc.
19. Nationwide Foam, Inc.
20. Nationwide Recycling Sales Management, Inc.
21. Physicians Choice Medical Marketing, LLC
22. Stone House Realty Group, LLC.

9. All recycling activities (mattresses, foam, etc.) at or near the NECC Facility;
10. All testing done at the NECC Facility, including without limitation air quality, air pressure, air flow, cleanliness, contamination, or the like.
11. GDC's responses to the Saint Thomas Entities' discovery requests, including without limitation the documents produced in response;
12. Information known or available to GDC regarding the circumstances of the contamination of MPA at the NECC Facility, the outbreak of fungal meningitis across several states, and the closing of NECC and Ameridose; and
13. Documents produced by any party on the US Legal repository involving any GDC representative or employee, including without limitation Steve Higgins.

Respectfully submitted,

/s/ Adam T. Schramek

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**CERTIFICATE OF SERVICE**

I certify that unless noted otherwise below, the foregoing was served by electronic mail on the 28<sup>th</sup> day of April, 2015.

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